Appendix A to the Declaration of E. Evans Wohlforth, Esq.

Document Title/ECF No.	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Re- lief is Not Granted	Why a Less Restrictive Alternative to the Re- lief Sought is Not Avail- able	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Letter dated March 12, 2024 [ECF No. 297]	Letter contains: (1) references to Save On SP, LLC's ("SaveOn") confidential marketing and business strategy, see ECF No. 297 Ex 1, 2, 4-8, 12-18, 21-26; and (2) references to a deposition transcript that contains direct and substantive reference to SaveOn's business strategy, see ECF No. 297 Ex. 3.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 1 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 1 contains an evaluation of an employee's phone call to a patient, comprising proprietary business information. <i>See</i> ECF No. 297 at Ex 1.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No.	No objection
Exhibit 2 to letter	Exhibit 2 contains an evaluation of an	If relief is not granted, SaveOn would be at a	It is believed that no less restrictive alternative is	No.	No objection

dated March 12, 2024 [ECF No. 297]	employee's phone call to a patient, comprising proprietary business information. <i>See</i> ECF No. 297 at Ex 2.	competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	available to prevent the disclosure of SaveOn's proprietary business information.		
Exhibit 3 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 10 is a confidential deposition transcript of a SaveOn employee, containing direct and substantive reference to the contents of SaveOn's business plan. <i>See</i> ECF No. 297 at Ex. 3.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	Yes, ECF No. 287 at Ex. 3.	No objection
Exhibit 4 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 4 is SaveOn's responses and objections ("R&Os") to JJHCS's interrogatories, containing confidential information about SaveOn's business plan, partners, strategy, and marketing and comprising proprietary business information. See ECF No. 297 at Ex. 4.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 5 to letter dated March 12,	Exhibit 5 is an internally generated document about SaveOn's services provided to health plans with which it partners	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's	No.	No objection

2024 [ECF No. 297]	outlining its services, comprising proprietary business information. See ECF No. 297 at Ex. 5.	information be disclosed to competitors and other market participants.	proprietary business information.		
Exhibit 6 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 6 is a presentation created by Express Scripts describing SaveOn, comprising proprietary business information about SaveOn's function and strategy. <i>See</i> ECF No. 297 at Ex. 6.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No.	No objection
Exhibit 7 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 7 is a spreadsheet containing information about SaveOn's interaction and partnership with health plans, comprising proprietary business information. <i>See</i> ECF No. 297 at Ex. 7.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No.	No objection
Exhibit 8 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 8 is a presentation created by Express Scripts describing SaveOn, comprising proprietary business information about SaveOn's services and strategy. <i>See</i> ECF No. 297 at Ex. 8.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No.	No objection

Exhibit 12 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 12 is a letter from counsel for JJHCS to counsel for SaveOn. The letter directly quotes from SaveOn's interrogatory responses and from internal SaveOn documents produced during discovery, containing references to proprietary business information about SaveOn's services and strategy. See ECF No. 297 at Ex. 12.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 13 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 13 is SaveOn's R&Os to JJHCS's interrogatories, containing confidential information about SaveOn's business plan, partners, strategy, and marketing and comprising proprietary business information. See ECF No. 297 at Ex. 13.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 14 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 14 is a series of emails between SaveOn employees and its health plan partners, discussing SaveOn's services and comprising proprietary	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No.	No objection

Exhibit 15	business information. See ECF No. 297 at Ex. 14. Exhibit 15 is SaveOn's	information be disclosed to competitors and other market participants. If relief is not granted,	A redacted, public ver-	No	No objection
to letter dated March 12, 2024 [ECF No. 297]	supplemental R&Os to JJHCS's interrogatories, containing confidential information about SaveOn's business plan, partners, strategy, and marketing and comprising proprietary business information. See ECF No. 297 at Ex. 15.	SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	sion of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		
Exhibit 16 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 16 is a letter from counsel for SaveOn to counsel for JJHCS. The letter contains direct references to SaveOn's business and marketing strategies, comprising proprietary business information. <i>See</i> ECF No. 297 at Ex. 16.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 17 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 17 is SaveOn's supplemental R&Os to JJHCS's second set of interrogatories, containing confidential information about SaveOn's business plan, partners, strategy, and	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	marketing and comprising proprietary business information. See ECF No. 297 at Ex. 17.	be disclosed to competitors and other market participants.			
Exhibit 18 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 18 is an internal presentation created by SaveOn to train its employees. The presentation contains information about one of SaveOn's services, SaveOn Advantage, comprising proprietary business information. See ECF No. 297 at Ex. 18.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No.	No objection
Exhibit 19 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 19 is an email from counsel for SaveOn to counsel for JJHCS. The email chain references SaveOn's marketing strategy, comprising confidential business information. See ECF No. 297 at Ex. 19.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the email is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 20 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 20 is a presentation created by Express Scripts describing SaveOn, comprising proprietary business information	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No.	No objection

Exhibit 21	about SaveOn's function and strategy. <i>See</i> ECF No. 297 at Ex. 20. Exhibit 21 is an email	information be disclosed to competitors and other market participants.	A malastal multipus	No	No abiastica
to letter dated March 12, 2024 [ECF No. 297]	from counsel for SaveOn to counsel for JJHCS. The email chain references SaveOn's marketing strategy, comprising confidential business information. <i>See</i> ECF No. 297 at Ex. 21.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the email is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 22 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 22 is an internal email chain between SaveOn employees discussing a patient's enrollment in JJHCS's copay assistance, comprising proprietary business information and confidential patient health information. See ECF No. 297 at Ex. 22.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 23 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 23 is an email from counsel for SaveOn to counsel for JJHCS. The email chain references SaveOn's marketing strategy, comprising confidential business information.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the email is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 24 to letter dated March 12, 2024 [ECF No. 297]	See ECF No. 297 at Ex. 23. Exhibit 24 is an internal email chain between SaveOn employees discussing the conduct of a SaveOn employee who interacted with health plan patients, comprising	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
F-1.11 / 25	proprietary business information about SaveOn's marketing and strategy. <i>See</i> ECF No. 297 at Ex. 24.	If and the first	A 1 11.	N.	NI. altitudi
Exhibit 25 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 25 is SaveOn's supplemental R&Os to JJHCS's third set of interrogatories, containing confidential information about SaveOn's business plans, partners, strategy, and marketing and comprising proprietary business information. See ECF No. 297 at Ex. 25.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 26 to letter dated March 12, 2024 [ECF No. 297]	Exhibit 26 is an internal email chain between SaveOn employees discussing eligible drugs, comprising proprietary business information.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	See ECF No. 297 at Ex. 26.				
Letter dated March 20, 2024 [ECF No. 297]	Letter contains: (1) references to internal evaluations and analysis of SaveOn services, see ECF No. 297 at Ex. 2, 3, 5-15; (2) information about its drug lists, see ECF No. 297 at JJHCS Ex. 5, 14, 15; and (3) information about its marketing strategy, see ECF No. 297 at JJHCS Ex. 1-4, 6, 8, 15, 17-18, 20, 22, 25; SaveOn Ex. 17-19.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 1 to letter dated March 20, 2024 [ECF No. 297]	Exhibit 1 is a presentation created by SaveOn about its services and benefits, comprising proprietary business information. See ECF No. 297 at Ex. 1.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 2 to letter dated March 20, 2024 [ECF No. 297]	Exhibit 2 is a presentation created by SaveOn about its services and benefits, comprising proprietary business information. See ECF No. 297 at Ex. 2.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No	No objection

Exhibit 3	Exhibit 3 is an internal	If relief is not granted,	It is believed that no less	No	No objection
to letter	email chain between	SaveOn would be at a	restrictive alternative is	INO	No objection
dated	SaveOn employees	competitive disadvantage	available to prevent the		
March 20,	discussing its partnership	should its proprietary	disclosure of SaveOn's		
2024 [ECF	with a corporate health	non-public business	proprietary business in-		
No. 297]	plan, comprising	information be disclosed.	formation.		
1(0. 257]	proprietary business				
	information. See ECF				
	No. 297 at Ex. 3.				
Exhibit 5	Exhibit 5 is an internal	If relief is not granted,	It is believed that no less	No	No objection
to letter	email chain between	SaveOn would be at a	restrictive alternative is		3
dated	SaveOn employees	competitive disadvantage	available to prevent the		
March 20,	discussing a conversation	should its proprietary	disclosure of SaveOn's		
2024 [ECF	with a patient enrolled in	non-public business	proprietary business in-		
No. 297]	SaveOn, comprising	information be disclosed.	formation.		
_	proprietary business				
	information about	Patients would also be			
	SaveOn's marketing and	harmed by the disclosure			
	confidential patient	of their confidential			
	health information. See	health information.			
	ECF No. 297 at Ex. 5.				
Exhibit 6	Exhibit 6 is an internal	If relief is not granted,	It is believed that no less	No	No objection
to letter	email chain between	SaveOn would be at a	restrictive alternative is		
dated	SaveOn employees	competitive disadvantage	available to prevent the		
March 20,	discussing a conversation	should its proprietary	disclosure of SaveOn's		
2024 [ECF	with a patient enrolled in	non-public business	proprietary business in-		
No. 297]	SaveOn, comprising	information be disclosed.	formation.		
	proprietary business				
	information about	Patients would also be			
	SaveOn's marketing and	harmed by the disclosure			
	confidential patient	of their confidential			
	health information. See	health information.			
	ECF No. 297 at Ex. 6.				

Exhibit 7	Exhibit 7 is an email	If relief is not granted,	It is believed that no less	No	No objection
to letter	chain between SaveOn	SaveOn would be at a	restrictive alternative is		3
dated	employees and a patient	competitive disadvantage	available to prevent the		
March 20,	enrolled in SaveOn,	should its proprietary	disclosure of SaveOn's		
2024 [ECF	discussing a call between	non-public business	proprietary business in-		
No. 297]	a SaveOn employee and	information be disclosed.	formation.		
,	that patient, comprising				
	proprietary business	Patients would also be			
	information about	harmed by the disclosure			
	SaveOn's marketing and	of their confidential			
	confidential patient	health information.			
	health information. See				
	ECF No. 297 at Ex. 7.				
Exhibit 8	Exhibit 8 is an email	If relief is not granted,	It is believed that no less	No	No objection
to letter	chain between SaveOn	SaveOn would be at a	restrictive alternative is		
dated	employees and a patient	competitive disadvantage	available to prevent the		
March 20,	enrolled in SaveOn,	should its proprietary	disclosure of SaveOn's		
2024 [ECF	discussing a call between	non-public business	proprietary business in-		
No. 297]	a SaveOn employee and	information be disclosed.	formation.		
	that patient, comprising				
	proprietary business	Patients would also be			
	information about	harmed by the disclosure			
	SaveOn's marketing and	of their confidential			
	confidential patient	health information.			
	health information. See				
T 111 . 0	ECF No. 297 at Ex. 8.	TO 11 01	T. 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	N. T.	NY 11
Exhibit 9	Exhibit 9 is an email	If relief is not granted,	It is believed that no less	No	No objection
to letter	chain between SaveOn	SaveOn would be at a	restrictive alternative is		
dated	employees and a patient	competitive disadvantage	available to prevent the		
March 20,	enrolled in SaveOn,	should its proprietary	disclosure of SaveOn's		
2024 [ECF	discussing a call between	non-public business information be disclosed.	proprietary business in-		
No. 297]	a SaveOn employee and	information be disclosed.	formation.		
	that patient, comprising				

Exhibit 10 to letter dated March 20, 2024 [ECF No. 297]	proprietary business information about SaveOn's marketing and confidential patient health information. See ECF No. 297 at Ex. 9. Exhibit 10 is an email chain between SaveOn employees and a patient enrolled in SaveOn, discussing a call between a SaveOn employee and that patient, comprising proprietary business information about SaveOn's marketing and confidential patient health information. See	Patients would also be harmed by the disclosure of their confidential health information. If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 11 to letter dated March 20, 2024 [ECF No. 297]	ECF No. 297 at Ex. 10. Exhibit 11 is an email chain between SaveOn employees and a patient enrolled in SaveOn, discussing a call between a SaveOn employee and that patient, comprising proprietary business information about SaveOn's marketing and confidential patient health information. See ECF No. 297 at Ex. 11.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 12 to letter dated March 20, 2024 [ECF No. 297]	Exhibit 12 is an email chain between SaveOn employees and a patient enrolled in SaveOn, discussing a call between a SaveOn employee and that patient, comprising proprietary business information about SaveOn's marketing and confidential patient health information. See ECF No. 297 at Ex. 12.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 13 to letter dated March 20, 2024 [ECF No. 297]	Exhibit 13 is an email chain between SaveOn employees and a patient enrolled in SaveOn, discussing a call between a SaveOn employee and that patient, comprising proprietary business information about SaveOn's marketing and confidential patient health information. See ECF No. 297 at Ex. 13.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 14 to letter dated March 20, 2024 [ECF No. 297]	Exhibit 14 is a letter from a patient enrolled in SaveOn to SaveOn leadership, discussing a call between a SaveOn employee and that patient, comprising	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 15 to letter dated March 20, 2024 [ECF No. 297]	proprietary business information about SaveOn's marketing and confidential patient health information. See ECF No. 297 at Ex. 14. Exhibit 15 is a letter from a patient enrolled in SaveOn to SaveOn leadership, discussing a call between a SaveOn employee and that patient, comprising proprietary business information about SaveOn's marketing and confidential patient health information. See ECF No. 297 at Ex. 15.	Patients would also be harmed by the disclosure of their confidential health information. If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 16 to letter dated March 20, 2024 [ECF No. 297]	Exhibit 17 is SaveOn's supplemental R&Os to JJHCS's third set of interrogatories, containing confidential information about SaveOn's business plan, partners, strategy, and marketing and comprising proprietary business information. See ECF No. 297 at Ex. 17.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 17 to letter dated March 20, 2024 [ECF No. 297]	Exhibit 17 is an internal document providing answers to health plans' frequently asked questions about SaveOn's services, comprising proprietary business information. See ECF No. 297 at Ex. 17.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 18 to letter dated March 20, 2024 [ECF No. 297]	Exhibit 18 is an internal email chain between SaveOn employees discussing SaveOn drug lists and health plan copay costs, comprising proprietary business information about SaveOn's services. See ECF No. 297 at Ex. 18.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 19 to letter dated March 20, 2024 [ECF No. 297]	Exhibit 19 is a meeting agenda for an internal SaveOn meeting held in February 2022, containing references to SaveOn's marketing and business strategies, comprising proprietary business information. See ECF No. 297 at Ex. 19.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 20 to letter	Exhibit 20 is a letter from counsel for JJHCS	If relief is not granted, SaveOn would be at a	A redacted, public version of the letter is being	No	No objection

dated	to counsel for SaveOn.		filed. It is believed that		
		competitive disadvantage			
March 20,	The letter references	should its proprietary	no less restrictive alter-		
2024 [ECF	SaveOn's confidential	non-public business in-	native is available to pre-		
No. 297]	marketing materials and	formation and strategy	vent the disclosure of		
	strategy, comprising	be disclosed to competi-	SaveOn's proprietary		
	proprietary business	tors and other market	business information.		
	information. See ECF	participants.			
	No. 297 at Ex. 20.				
Exhibit 21	Exhibit 21 is a letter	If relief is not granted,	A redacted, public ver-	No	No objection
to letter	from counsel for JJHCS	SaveOn would be at a	sion of the letter is being		
dated	to counsel for SaveOn.	competitive disadvantage	filed. It is believed that		
March 20,	The letter references	should its proprietary	no less restrictive alter-		
2024 [ECF	SaveOn's confidential	non-public business in-	native is available to pre-		
No. 297]	marketing materials and	formation and strategy	vent the disclosure of		
-	strategy, comprising	be disclosed to competi-	SaveOn's proprietary		
	proprietary business	tors and other market	business information.		
	information. See ECF	participants.			
	No. 297 at Ex. 21.				
Exhibit 22	Exhibit 22 is a	If relief is not granted,	It is believed that no less	No	No objection
to letter	spreadsheet created by	SaveOn would be at a	restrictive alternative is		Ū
dated	SaveOn compiling	competitive disadvantage	available to prevent the		
March 20,	patient enrollment and	should its proprietary	disclosure of SaveOn's		
2024 [ECF	drug information,	non-public business	proprietary business in-		
No. 297]	comprising proprietary	information be disclosed.	formation.		
•	business and marketing				
	information about	Patients would also be			
	SaveOn and confidential	harmed by the disclosure			
	patient health	of their confidential			
	information. See ECF	health information.			
	No. 297 at Ex. 22.				
Letter	The letter contains	If relief is not granted,	A redacted, public ver-	No	No objection
dated	references to SaveOn's	SaveOn would be at a	sion of the letter is being		,
March 22,	marketing strategy,	competitive disadvantage	filed. It is believed that		

2024 [ECF	comprising proprietary	should its proprietary	no less restrictive alter-		
_	business information, see				
No. 297]	1	non-public business in-	native is available to prevent the disclosure of		
	ECF No. 297 at Ex. 5, 8,	formation and strategy			
	14, 17, 20, 25, 30-37, 39-	be disclosed to competi-	SaveOn's proprietary		
	42; SaveOn Ex. 9, 11,	tors and other market	business information.		
T 1 11 1 20	15.	participants.			N. 11
Exhibit 30	Exhibit 30 is an internal	If relief is not granted,	It is believed that no less	No	No objection
to letter	spreadsheet with	SaveOn would be at a	restrictive alternative is		
dated	information about	competitive disadvantage	available to prevent the		
March 22,	SaveOn-enrolled	should its proprietary	disclosure of SaveOn's		
2024 [ECF	patients, directing	non-public business	proprietary business in-		
No. 297]	SaveOn employees'	information be disclosed.	formation.		
	correspondence with the				
	patients. Exhibit 30	Patients would also be			
	contains proprietary	harmed by the disclosure			
	business information	of their confidential			
	about SaveOn and	health information.			
	confidential patient				
	health information. See				
	ECF No. 297 Ex. 30.				
Exhibit 31	Exhibit 31 is an internal	If relief is not granted,	It is believed that no less	No	No objection
to letter	email chain between	SaveOn would be at a	restrictive alternative is		
dated	SaveOn employees with	competitive disadvantage	available to prevent the		
March 22,	information about	should its proprietary	disclosure of SaveOn's		
2024 [ECF	SaveOn-enrolled	non-public business	proprietary business in-		
No. 297]	patients, directing	information be disclosed.	formation.		
	SaveOn employees'				
	correspondence with the	Patients would also be			
	patients. Exhibit 31	harmed by the disclosure			
	contains proprietary	of their confidential			
	business information	health information.			
	about SaveOn and	incutati initotitianioni.			
	confidential patient				
	Confidential patient				

	health information. See				
	ECF No. 297 Ex. 31.				
Exhibit 32 to letter dated March 22, 2024 [ECF No. 297]	Exhibit 32 is an internal SaveOn task list, containing information about SaveOn's strategy and marketing plans and comprising proprietary business information. See ECF No. 297 at Ex. 32.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No	No objection
Exhibit 33 to letter dated March 22, 2024 [ECF No. 297]	Exhibit 33 is an internal document compiling feedback from patients about their interactions with SaveOn, comprising proprietary business information about SaveOn's marketing strategy. <i>See</i> ECF No. 297 at Ex. 33.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 34 to letter dated March 22, 2024 [ECF No. 297]	Exhibit 34 is an internal email chain between SaveOn employees with information about SaveOn-enrolled patients, directing SaveOn employees' correspondence with the patients. Exhibit 34 contains proprietary business information about SaveOn and	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 35 to letter dated March 22, 2024 [ECF No. 297]	confidential patient health information. See ECF No. 297 Ex. 34. Exhibit 35 is an email chain between SaveOn employees, Express Scripts, and a health plan employee with information about SaveOn-enrolled patients	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
	and directing SaveOn employees' correspondence with the patients. Exhibit 35 contains proprietary business information about SaveOn and confidential patient health information. See ECF No. 297 Ex. 35.	Patients would also be harmed by the disclosure of their confidential health information.			
Exhibit 36 to letter dated March 22, 2024 [ECF No. 297]	Exhibit 36 is SaveOn's R&Os to JJHCS's eleventh set of interrogatories, containing confidential information about SaveOn's business plan, partners, strategy, and marketing and comprising proprietary business information. See ECF No. 297 at Ex. 36.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 37 to letter dated March 22, 2024 [ECF No. 297]	Exhibit 37 is a presentation about SaveOn's Advantage program, comprising proprietary business information about its marketing and business strategy. <i>See</i> ECF No. 297 at Ex. 37.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 39 to letter dated March 22, 2024 [ECF No. 297]	Exhibit 39 is a letter from counsel for JJHCS to counsel for SaveOn. The letter contains direct references to SaveOn's business and marketing strategies, comprising proprietary business information. <i>See</i> ECF No. 297 at Ex. 39.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 40 to letter dated March 22, 2024 [ECF No. 297]	Exhibit 40 is a letter from counsel for SaveOn to counsel for JJHCS. The letter contains direct references to SaveOn's business and marketing strategies, comprising proprietary business information. <i>See</i> ECF No. 297 at Ex. 40.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 41 to letter dated March 22,	Exhibit 41 is SaveOn's March 2020 training manual, comprising proprietary business	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's	No	No objection

2024 [ECF No. 297]	information about marketing and outreach. <i>See</i> ECF No. 297 at Ex. 41.	non-public business information be disclosed.	proprietary business information.		
Exhibit 42 to letter dated March 22, 2024 [ECF No. 297]	Exhibit 42 is an internal presentation about SaveOn's October 2019 "operations update," comprising proprietary business information about SaveOn's services and strategy. See ECF No. 297 at Ex. 42.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection